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*Attorneys for Plaintiffs*

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 YITZCHOK FRANKEL *et al.*,

18 Plaintiffs,

19 v.

20 REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA *et al.*,

22 Defendants.

Case No.: 2:24-cv-4702

**DECLARATION OF  
YITZCHOK FRANKEL  
IN SUPPORT OF  
PLAINTIFFS' MOTION  
FOR PRELIMINARY  
INJUNCTION**

23 Date: July 29, 2024

24 Time: 9:00 a.m.

25 Courtroom: 7C

Judge: Hon. Mark C. Scarsi

26  
27  
28  
\* admitted *pro hac vice*

1 I, Yitzchok Frankel, declare and state as follows:

2 1. I am over the age of 18 and am capable of making this declaration  
3 pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the  
4 contents of this declaration.

5 2. This lawsuit was filed on June 5, 2024. Since the time of that filing,  
6 UCLA has continued its failure to remedy the antisemitism running  
7 rampant on campus. Those failures are still having a negative impact on  
8 me and are preventing me from entering campus without fear.

9 3. I have decided to refrain from several activities I would otherwise  
10 participate in because UCLA continues to refuse to guarantee my full,  
11 equal, and safe access to campus as a Jewish student.

12 4. For instance, I am the Vice President of the Jewish Law Students  
13 Association (JLSA). On June 27, 2024, the Director of Student Life at the  
14 Law School contacted the members of JLSA's board, asking whether we  
15 "would want to participate in hosting a lunch gathering for 1Ls on one  
16 day from August 16-22."

17 5. Under ordinary circumstances, I would have leapt at the chance to  
18 participate in this event. My Jewish identity and religion are integral to  
19 who I am, and I believe it is important to mentor incoming students and  
20 encourage them to be proud of their Judaism, too. I believe this is  
21 especially crucial now, given the heinous attacks taking place against  
22 Jews across the country, in Los Angeles, and on campus.

23 6. However, given the current on-campus climate and UCLA's refusal  
24 to ensure the safety of Jewish students, I feel compelled to decline  
25 because I do not feel safe participating in this event.

26 7. Given the continued (and successful) attempts to take over  
27 buildings and courtyards during May and June—including the law school  
28 courtyard—I believe it is likely that another hateful demonstration or

1 encampment will take place during orientation. I believe the activists  
2 could view this as the perfect opportunity to intimidate incoming Jewish  
3 students. And due to UCLA's failures during those same May and June  
4 takeovers, I have every reason to expect that UCLA will continue  
5 allowing such antisemitic activism and will not appropriately prevent,  
6 condemn, or redress these demonstrations nor punish the individuals  
7 who continue to participate in them.

8 8. My beliefs about UCLA's likely response are buttressed by a recent,  
9 dangerous, and violent attack on Jewish congregants at the Adas Torah  
10 synagogue—located in the Pico-Robertson neighborhood, which is only a  
11 few miles from UCLA's campus and is also where I live. In fact, I pass by  
12 that synagogue every Sabbath, and I have often prayed there. That  
13 attack took place on June 23, 2024, after prolonged coordination by  
14 activists via social media posts that included many of the same groups  
15 that have instigated demonstrations on UCLA's campus. After the attack  
16 began, Los Angeles police were instructed to “stand down” and not  
17 intervene.

18 9. These failures mirror the noninterventionist policies of UCLA.  
19 Especially since UCLA has never condemned that noninterventionist  
20 policy or abandoned it to ensure the safety of its Jewish students, I fully  
21 expect it to be followed if a similar attack takes place during  
22 orientation—or at any other time.

23 10. Indeed, I am aware that during the most recent campus  
24 demonstration on June 10, UCLA did nothing to protect its Jewish  
25 students even though the violence became so severe that Vice Chancellor  
26 Michael Beck had to be escorted away with armed security guards. As he  
27 was being escorted away, activists were shouting, “fuck you” and “you're  
28 not safe.” If not even UCLA's most senior officials can move through

1 campus safely, then I don't understand how I—a Jewish student and  
2 target of these antisemitic demonstrations—can feel safe doing the same  
3 either.

4 11. Under ordinary circumstances, I also would have traveled to  
5 campus before the beginning of classes to purchase my textbooks from  
6 the campus bookstore. I go early to ensure I get my textbooks before books  
7 are sold out. However, due to the concerns over my safety, I feel pressured  
8 to refrain from making these early purchases.

9 12. UCLA's failures have also continued to negatively impact my  
10 family. Last year, on July 2, 2023, my family traveled to campus to  
11 purchase UCLA-branded baby clothing in anticipation of the birth of our  
12 youngest son. This campus trip was just one of many times that I proudly  
13 brought my family to campus so my children could experience and  
14 understand my studies and how I am working to provide for them.

15 13. While there, we took a picture in front of the "Bruin Bear" in Bruin  
16 Plaza to commemorate the occasion and our happiness at learning that a  
17 new baby boy would soon be joining our family.

18 14. At the time, we planned to return to campus after the birth of our  
19 son to visit the on-campus botanical gardens and to re-create the photo—  
20 this time with the newest member of our family in tow.

21 15. Bruin Plaza has since been the site of demonstrations by the  
22 groups that instigated the encampments and the Jew Exclusion Zone.

23 16. Therefore, as a father and husband, I could never put my family—  
24 particularly my young children—at risk by bringing them to campus,  
25 knowing that, should anything happen to us, UCLA would not intervene.  
26 We have accordingly cancelled our trip and abandoned this plan to make  
27 family memories.  
28

1 I declare under penalty of perjury that the foregoing is true and correct.  
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3 Executed on this 11 day of July, 2024.  
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6 Yitzchok Frankel  
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DECLARATION OF YITZCHOK FRANKEL